

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ABU DHABI COMMERCIAL BANK, et al.,

Plaintiffs,

- v. -

MORGAN STANLEY & CO. INCORPORATED, et al.,

Defendants.

Civil Action No. 1:08-cv-07508 (SAS)

**DECLARATION OF DEAN RINGEL IN SUPPORT OF  
DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO  
PLAINTIFFS' OMNIBUS MOTIONS IN LIMINE**

**\*\* REDACTED VERSION \*\***

I, DEAN RINGEL, declare under penalties of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the bar of this Court and a member of the firm Cahill Gordon & Reindel LLP, which represents defendants The McGraw-Hill Companies, Inc. and Standard & Poor's Ratings Services (collectively, "S&P") in the above-captioned action. I submit this declaration to place before the Court certain documents referenced in Defendants' Memorandum of Law in Opposition to Plaintiffs' Omnibus Motions in Limine. I am fully familiar with the facts set forth herein and make this declaration based on personal knowledge.

2. Annexed hereto as Exhibit 1 is a true and correct copy of a May 17, 2005 S&P "Presale" report bearing production numbers NACFe1242-49.

3. Annexed hereto as Exhibit 2 is a true and correct copy of a February 14, 2006 S&P "New Issue" report bearing production numbers CSAM9585-96.

4. Annexed hereto as Exhibit 3 is a true and correct copy of an August 3, 2005 Moody's "New Issue" report bearing production numbers MDYS ADCB 045382-95.

5. Annexed hereto as Exhibit 4 is a true and correct copy of a November 19, 2004 "Working Group List" bearing production numbers BNYM10488730-37.

6. Annexed hereto as Exhibit 5 is a true and correct copy of a "Working Group List" bearing production numbers MS000642299-312.

7. Annexed hereto as Exhibit 6 is a true and correct excerpted transcript of deposition testimony given in this case by Rany Moubarak.

8. Annexed hereto as Exhibit 7 is a true and correct excerpted transcript of deposition testimony given in this case by Yaser Humaidan.

9. Annexed hereto as Exhibit 8 is a true and correct excerpted transcript of deposition testimony given in this case by Adrian Mallinson.

10. Annexed hereto as Exhibit 9 is a true and correct excerpted transcript of deposition testimony given in this case by David Wilson.

11. Annexed hereto as Exhibit 10 is a true and correct copy of a November 5, 2007 email (with attachment) bearing production numbers ESECe0135135-37.

12. Annexed hereto as Exhibit 11 is a true and correct excerpted transcript of deposition testimony given in this case by James Chen.

13. Annexed hereto as Exhibit 12 is a true and correct excerpted copy of the November 7, 2012 Rebuttal Report of Michael A. Goldstein.

/s/ Dean Ringel  
Dean Ringel

Executed this 11th day of February, 2013, in New York, New York.